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May 14, 2021

## **VIA ECF**

Honorable Brian M. Cogan United States District Court Eastern District of New York 225 Cadman Plaza West Brooklyn, NY 11201

Re: Jose Panora v. Deenora Corp., et al.

Case No.: 19-CV-7267 (BMC)

Dear Judge Cogan:

We represent Defendants, Deenora Corp., Dee's Brick Oven Pizza, Inc., and Deeran Arabian (collectively, "Defendants"), in the above-referenced wage and hour lawsuit. Pursuant to Your Honor's Individual Practices, we write, with consent from Plaintiff's counsel, in advance of the May 26, 2021 conference to seek an adjournment of same, and to seek an extension of the current deadline for filing the proposed Joint Pretrial Order ("JPTO").

The parties have been diligently working to complete the JPTO, which is currently due on May 19, 2021. However, the undersigned underwent a medical procedure and the procedure, along with the require recovery, caused delays in the completion of the JPTO. Moreover, the undersigned has a preplanned vacation scheduled from June 6 until June 18, 2021. Accordingly, we write to request that the deadline to submit the JPTO be extended to June 2, 2021, and the May 26, 2021 conference be adjourned. The parties conferred and are available the following dates for an adjourned pretrial conference: June 22, June 24, and June 25. This is Defendants' first request for an adjournment and an extension.

We thank the Court for its time and attention to this matter.

Respectfully submitted, KAUFMAN DOLOWICH & VOLUCK, LLP

Aaron N. Solomon

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